

1 that Verizon would provide--let me call it central
2 office A, to get this straight.

3 MR. GOYAL: The point of interconnection
4 is at co-location at central office A?

5 MR. ALBERT: Correct. The CLEC would
6 co-locate at central office A, they would have
7 their physical DS3 facilities connected to
8 Verizon's at central office A. They would order
9 the DS3 between central office A and intermediate
10 hub--

11 MR. GOYAL: The DS3 ordered between
12 central office A and intermediate hub, when you say
13 "ordered," you mean that is--those are dedicated
14 facilities the CLEC is paying for?

15 MR. ALBERT: A dedicated DS3.

16 MR. GOYAL: That the CLEC is paying for
17 at--as UNE dedicated transport?

18 MR. ALBERT: Let's set aside the how and
19 who pays because that's another set of arguments we
20 could get into that.

21 MR. GOYAL: It's not a related set of
22 arguments.

1 MR. ALBERT: It is related but to
2 understand the multiplexing.

3 MR. GOYAL: Let's focus on the physical
4 provisioning.

5 MR. ALBERT: It's true, the GRIP, the
6 VGRIP, the IPs and the whims and the whams, that
7 overlays on a number of different issues, okay?
8 All of that is important because it just--it's a
9 decision point over who pays for the transport.
10 But a lot of these issues, you could look at them
11 first independent of who pays.

12 You got to eventually link them up a
13 little bit and make decisions together.

14 MR. GOYAL: I don't want to take up too
15 much of Mr. Keffer's time, so why don't you explain
16 the physical provisioning.

17 MR. ALBERT: The CLEC will order from
18 their co-lo to the intermediate hub, at which point
19 this would be from the central office A through the
20 intermediate hub. This would be physical Verizon
21 facilities.

22 MR. GOYAL: And DS3 level?

1 MR. ALBERT: Interoffice, it would be up
2 to OC48, but that DS3 portion of that OC48 would be
3 dedicated to the CLEC.

4 MR. GOYAL: In the intermediate hub this
5 would be deMUXed into the DS1s?

6 MR. ALBERT: Correct.

7 MR. GOYAL: Sorry, Mr. Keffer.

8 MR. KEFFER: No, that was helpful.

9 MR. ALBERT: I didn't get to my point.

10 MR. KEFFER: Go ahead and get your pony,
11 Al, but I was going to suggest that Mr. Talbott be
12 permitted to respond to this, and we will deal with
13 this one issue at once, and the staff could ask
14 their questions. I think that would be the most
15 efficient way to deal with this, given we are
16 pretty deep into this one issue right now.

17 MR. ALBERT: Okay. Terminus hub, the
18 other type we talked about, is a location in the
19 NECA 4 tariff. Verizon does multiplexing there for
20 carriers. We had an electronic digital
21 cross-connect machine, a three-by-one digital
22 cross-connect machine located there which we used

1 to do in three-to-one multiplexing. However, in a
2 terminus hubs, the DS1s that are then demultiplexed
3 down, DS1 trunks can be terminated to a switching
4 machine in that building, which is the distinction
5 between a terminus hub versus the intermediate.
6 And a terminus hub there is not sufficient buildup
7 interoffice facility capacity to then take the DS1s
8 that were demultiplexed further out into Verizon's
9 network.

10 So, the actual trunk ordering to terminus
11 hub, if multiplexing is ordered at terminus hub,
12 those switched trunks that are ordered have to
13 terminate to the switching machines that are
14 located in that central office building.

15 Now, offices that are intermediate hubs
16 and terminus hubs are such because we do have the
17 electronic digital cross-connect machines that
18 allow us to do three-to-one multiplexing or IXC's
19 for CLECs. Intermediate hubs are intermediate hubs
20 because we got enough IOF facilities in place to
21 take orders from CLECs for DS1s that would run
22 through the intermediate hub through the subtending

1 offices.

2 I think what AT&T and WorldCom are saying
3 is they would like to be able to do multiplexing
4 anywhere in any of our central offices. Obviously,
5 we don't offer that in the tariffs, the way it is
6 today.

7 What we could do, and the reason for that
8 is we don't have a three-to-one cross-connect
9 machines.

10 Now, multiplexing with the big M, which I
11 said we do do, which is different than the much
12 narrower trunking DS3, multiplexing we do in big
13 buildings and all carriers do that. But if ordered
14 to do a DS3 to DS1 multiplexing for an IXC or for a
15 CLEC for switched trunks in an office where we
16 didn't have a digital cross-connect machine, the
17 physical piece of equipment that we would have to
18 put in place would be an asynchronous--I will write
19 ASYNC, three/one multiplexor. And these are older
20 pieces of transmission equipment that came out in
21 the very first stages was fiber optics prior to
22 SONET, which is synchronous. We do have in these

1 offices some quantity of these 3/1 asynchronous
2 multiplexors.

3 However, we have stopped calling these
4 brand new for a while, and when we go into offices
5 and put in new electronic digital cross-connect
6 machines, we retire these pieces of equipment. But
7 this is the piece of equipment that physically to
8 do dedicated to a carrier where we break their
9 whole DS3 into 28 DS1s that they specify, that
10 would be the type of equipment that we would have
11 to deploy in the end office to do multiplexing for
12 a CLEC for switched trunks if they wanted to do it
13 in an office where it's not offered today for the
14 tariff designations.

15 Here is where we get to the pony. Now, if
16 WorldCom or AT&T would want to put into the
17 contract that in these offices, in order to do
18 terminus-type multiplexing to bust down in those
19 offices the DS3s and DS1s, we could do that. But
20 what it would require is you would have to go and
21 find a dead spare async three-to-one multiplexor
22 somewhere, we would have to de-install it from its

1 current location. We would have to reinstall it in
2 an office where you would want us to do the
3 three-to-one multiplexing, and that's the physical
4 way we would have to provide it.

5 Now--

6 MR. KEFFER: Sort of "Sanford and Son"
7 multiplexor?

8 MR. ALBERT: It really is. It would take
9 a lot longer and be very expensive and would be
10 very inefficient.

11 MR. KEFFER: You make it sound so
12 attractive.

13 MR. ALBERT: That's why you thought this
14 issue would go away because the option to do it
15 anywhere you want is to do this expensive
16 time-consuming thing, and doesn't make sense, but
17 maybe we weren't all quite understanding each other
18 relative to big M multiplexing as opposed to the
19 precise contractual multiplexing for switched
20 trunks.

21 Realistically, to do this, to find a dead
22 spare async multiplexor and de-install and install

1 it, we are talking four months to do that, just
2 normal lead times with our vendors to get things
3 done. So, it's not going to be speedy. It's not
4 going to be cheap.

5 I would throw that out--I would prefer not
6 to put that into the Interconnection Agreement
7 because to me it would seem like we had something
8 in there if you get an option, but it would not
9 seem to me to be a very practical, efficient or
10 usable option.

11 But other than that, I think we are just
12 arguing over theory that when you translate it to
13 practical reality, the one way to do what I thought
14 you were asking for is going to take a long time
15 with trunks and be very expensive.

16 MR. KEFFER: Let me see if I could boil
17 that down to the salient points here. You do
18 multiplexings for yourself today in each end
19 office, but you do not deploy the equipment that,
20 in your view, would be required to do multiplexing
21 for CLECs in every single office. You have
22 described a mechanism by which it might be possible

1 to do it, some offices using salvaged equipment
2 that you otherwise would be throwing away.

3 MR. ALBERT: I have been resisting
4 agreeing with you that we do multiplexings for
5 ourselves in the broad sense because--

6 MR. KEFFER: I noticed that.

7 MR. ALBERT: Right, because the type of
8 multiplexing we are talking about here in the
9 contract is a narrow specific precise type of
10 multiplexing that, when you deal with it, is much,
11 much different operationally than when you use the
12 term multiplexing in the big broad context.

13 MR. GOYAL: If I could address one
14 outstanding point with respect to those
15 hypotheticals, Mr. D'Amico, are you familiar with,
16 or would you be familiar with the manner in which
17 Verizon is compensated, if at all, for the
18 transport between central office A and the
19 intermediate hub location where a CLEC chooses to
20 imply DS3 interconnection facilities to central
21 office A?

22 MR. D'AMICO: Yes. In that scenario, in

1 central office A--that's a co-location cage; right?

2 MR. GOYAL: Yes, that's the POI.

3 MR. D'AMICO: So they are going to--I'm
4 assuming they're going to have me go to the
5 intermediate hub, and then there's going to be DS1s
6 that spin off from that to the Verizon end offices.

7 MR. GOYAL: It was about the compensation
8 to Verizon, if any, for the DS3 transport between
9 central office A and the intermediate hub. Does
10 the CLEC pay for that as dedicated transport?

11 MR. D'AMICO: Yes. That would be--well,
12 in that diagram, it looks like it would be a
13 cross-connect from the cage to within that CO-A,
14 and from that central office A there would be
15 direct trunk transport to the intermediate office.

16 MR. GOYAL: Thank you. Did you want
17 Mr. Talbott to--

18 MR. KEFFER: As I suggested a few moments
19 ago, I think that given I will let Mr. Albert go on
20 and make his points on this issue, it might be most
21 efficient if it's acceptable to you to let
22 Mr. Mr. Schell and/or Mr. Talbott respond to what

1 Mr. Albert said, and then we could dispense with
2 the debate on this issue up front.

3 MR. DYGERT: I think that's fine.

4 MR. SCHELL: John Schell. I will address
5 it for AT&T.

6 First thing I would like to point out is
7 to take this issue and put it into context with a
8 couple of other Verizon proposals. Verizon has
9 proposed in the point issue, issue I-1, GRIP and
10 VGRIP which would drive the CLECs to interconnect
11 at Verizon end offices.

12 If not all of them, most of them--and in
13 case that proposal misses any end offices, they
14 propose that when your volume of traffic from a
15 tandem exceeds 24 circuits, DS1 volume of traffic,
16 and here I'm referring to issue I-4 tandem exhaust,
17 that you build a direct trunk group to that end
18 office.

19 So, on the one hand Verizon is saying we
20 are going to drive you to interconnect at all of
21 our end offices or most of our end offices. And
22 then Verizon says, "However, we are not going to

1 allow you to choose the most efficient form of
2 interconnection in those offices. We are going to
3 limit you to the DS1 form of interconnection. And
4 not only that, but in another issue on the table,
5 we are going to charge you special access rates,
6 not TELRIC rates, but special access rates for
7 that."

8 And the reason, and I'm going up to the
9 chart in a moment to address this in more detail,
10 but in summary the reason they say you cannot
11 connect at each of our end offices is we don't have
12 the right kind of multiplexed equipment there.

13 Now, I have 35 years in telephony, and I
14 was a transmission engineer for AT&T for many years
15 for the eastern region of AT&T Communications, and
16 I can assure you that multiplex equipment is
17 multiplex equipment.

18 Now, functionally, they have agreed that
19 in each of their offices, they have the equipment
20 to multiplex signals from SONET to the DS1 level
21 because, as Mr. Albert has testified, you must be
22 at the DS1 level to interface the switch. So, at

1 every single office, they could get off of their
2 fiber optic system down to DS1.

3 That proves the technical feasibility of
4 that arrangement under 198 of the Commission's
5 First Report and Order. They do it, they do it in
6 all their offices. It's technically feasible.

7 So, the first thing to understand is what
8 Mr. Albert is parsing out is the type of multiplex
9 equipment you use to perform that function. Now, a
10 digital cross-connect system combines the
11 capabilities of two pieces of gear, the M13
12 multiplexor stand-alone, and a manual
13 cross-connect, where you literally went up to a DS1
14 cross-connect and you cross-connected two signals.

15 What the digital cross-connect system
16 does--and you could buy it in several varieties--is
17 it combines those two functionalities into one
18 piece of equipment and allows you to make the
19 cross-connections in software rather than having to
20 do it physically.

21 Other than that, they are functionally the
22 same.

1 But Mr. Albert was referring to in
2 response to Mr. Goyal's question, is given that
3 they're going to want us ultimately to interconnect
4 in each of these end offices, the way they're
5 saying we would have to do it, though, is not to
6 bring a DS3 circuit from the CLEC point of presence
7 down to central office A at DS3 level and obtain
8 the multiplexing functionality there and put the
9 DS1s into that switch, and yes, maybe extend some
10 of the DS1s from there to central office B or to
11 central office C. They're saying no, you have to
12 take all of those and either obtain another
13 interoffice facility from us to the NECA 4 office--

14 MR. GOYAL: Just so we are clear about the
15 nature of the exhibit, could you label on the top
16 left-hand corner that the red markings are AT&T
17 exhibit on top of black markings, and I don't know
18 what the next AT&T exhibit number is.

19 MR. SCHELL: What Verizon would have us
20 do, and again, when you look at the impact of all
21 of their proposals taken together, you could see
22 the mark. Number one, they interconnect at every

1 end office, but in another proposal they tell you
2 that are you not free to choose to interconnect
3 there. You must interconnect at DS1.

4 So, you either buy DS1 circuits when
5 they're not cost-effective, or if you buy a DS3
6 circuit, and the example Mr. Albert drew, take it
7 from central office A over to the NECA 4 office
8 where they offer that functionality, and then break
9 it out into--up to 28 DS1s and bring those DS1s
10 back to that office or at least some subset of
11 those DS1s back to the office, and then possibly
12 also take some the DS1s from that office to say
13 central office B or other end offices.

14 So, the end result of all this is again,
15 bottom line, does functionality exist in this
16 office? Yes. They do it today, they do it for
17 themselves. The difference is they want to reserve
18 a certain set of equipment for their own use and
19 not make it available for CLECs' usage.

20 Mr. Albert talks about going out and
21 finding all of this old M13 equipment and moving it
22 into these offices to provide it to the CLECs.

1 Either you're already using that equipment in those
2 offices or they have the newer digital
3 cross-connect equipment in that office. In either
4 event, they could provide the functionality AT&T is
5 requesting.

6 MR. TALBOTT: If I could add, under the
7 example that Mr. Schell used at central office A,
8 if AT&T had exceeded the 200,000-minute threshold
9 at that office and we wanted to establish a direct
10 trunk or were required to and had our POI at
11 central office A, we would have to purchase DS3
12 special access from central office A to the
13 intermediate hub location and purchase 28 DS1 or a
14 sufficient number of DS1s back to central office A,
15 special accessed rates for the number of trunks
16 that were required at that office.

17 So, completely inefficient arrangement
18 rather than establishing the facilities to the
19 office where under Verizon's proposal we would be
20 required to trunk to.

21 MR. GOYAL: If I could ask just a couple
22 of questions of Mr. Talbott in response to that

1 testimony by Mr. Schell and Mr. Talbott, does
2 Verizon maintain multiplexing and demultiplexing
3 equipment capable of taking traffic down from a DS3
4 to a DS1 or from other technically feasible or from
5 other technical interfaces to a DS1 at locations
6 other than the intermediate hub locations for its
7 own capital M multiplexing?

8 MR. ALBERT: For its own capital M? Yes,
9 but not that can be ordered by a CLEC.

10 MR. GOYAL: Is the reason it can't be
11 ordered by CLEC due to the interoffice facility
12 constraints you were referencing earlier in your
13 testimony?

14 MR. ALBERT: That's one, but it's also due
15 to multiplexing unto itself.

16 What AT&T is blurring in their description
17 is combining the terms "interconnection" with the
18 very specific part of the contract here that's
19 related to trunk ordering, and those are two
20 related but yet two different things. The way
21 trunks are ordered today by CLECs and by IXC's and
22 by everybody, which matches the way the OBF is set

1 up. There are only two ways you could order a DS1
2 interface on the switches or you could order
3 multiplexing of a DS3 on MUXed DS3 down to a DS1.

4 We are very specifically in this part of
5 the contract dealing with DS3 to DS1 multiplexing.
6 The multiplexing that Mr. Schell described when he
7 talked about stepping down a SONET system all the
8 way to the DS1, that multiplexing with a big M does
9 occur in those offices. That is not, though, what
10 the CLEC orders. That's not what's being dealt
11 with in this portion of the contract.

12 MR. GOYAL: I suppose to some extent I'm
13 wondering if that doesn't miss the issue, though.
14 Isn't the issue not that interconnection trunks
15 can't currently be ordered at those offices at
16 other than DS1 interfaces, but why they can't be?
17 I understand your testimony that the ordering of
18 trunks in the physical interfaces and multiplexing
19 are two different things, but what I would like you
20 to explain, if possible, is why--why
21 interconnection trunks can't be ordered at the same
22 interfaces at which multiplexing or demultiplexing

1 is performed in nonhub locations.

2 MR. ALBERT: I guess, one, because no CLEC
3 has ever asked for it, and they haven't asked for
4 it in this contract.

5 And the reason I think here we are more on
6 a theoretical debate on this issue is because if
7 there was a different type of multiplexing other
8 than DS3 or DS1, and if a CLEC or an IXC seriously
9 wanted it, seriously wanted to be able to use it,
10 they would have to go to the ordering and billing
11 forum to raise the issues with the standards bodies
12 and to work through and develop the means for those
13 other types of interfaces and other types of
14 multiplexing and other types of arrangements could
15 be worked out in the standard way for the industry
16 to use.

17 So, the things they are describing, we
18 haven't worked on it in negotiations. They have
19 never gone to the standards bodies for it, and
20 there are no IXCs or CLECs today that are asking us
21 for it.

22 There are a lot of things that are

1 technically imaginable and a lot of things that are
2 technically possible, but if somebody wants it,
3 they got to ask for it, and there are processes to
4 go through and find what it really is, and to
5 figure out and work the standards on how to order
6 it, and figure out the standards on how you're
7 going to maintain it, and all of the work that's
8 involved with developing any new service, and we do
9 that with carriers for different things all the
10 time.

11 But for this stepping down all the way
12 from a SONET signal to a DS1 for trunk ordering, we
13 haven't negotiated it, and they haven't asked for
14 it, and nobody in the world is going to do any of
15 the standards bodies for it.

16 MR. DYGERT: Mr. Schell, let me interrupt
17 you. I would rather much get back to the more
18 traditional question-and-answer format instead of
19 this competing presentation by our witnesses.

20 And Mr. Keffer, if you continue with your
21 examination.

22 MR. KEFFER: I'm going to move now to

1 issue V-8.

2 Now, I'm not sure which of the Verizon
3 witnesses can address this question, but assume
4 hypothetically you got an AT&T customer connected
5 to an AT&T switch, and that AT&T customer is
6 originating an interexchange call that is going to
7 be routed to an interexchange carrier other than
8 AT&T, AT&T directs the call to Verizon's tandem
9 switch, and Verizon puts it on a trunk to the
10 appropriate interexchange carrier. Are you with
11 me?

12 MR. D'AMICO: Yes.

13 MR. KEFFER: That situation is addressed
14 in our proposed Interconnection Agreement
15 Section 6.3.1; is that correct?

16 MR. D'AMICO: Yes. We refer to those as
17 the access toll connecting trunks.

18 MR. KEFFER: All right. Let's now have
19 Verizon and AT&T trade places. Now, Verizon is the
20 local exchange carrier, and Verizon's customer
21 wants to make a toll call. And then this
22 hypothetical, the toll call is to the interexchange

1 carrier that wants to use AT&T's switch as the
2 tandem. So, hypothetically, the call would go from
3 your end office to your AT&T switch functioning as
4 a tandem, put it on a trunk to the interexchange
5 carrier that would complete the call.

6 That situation is not addressed in the
7 Interconnection Agreement between us, is it?

8 MR. D'AMICO: Correct.

9 MR. KEFFER: In fact, you don't want that
10 situation addressed in the Interconnection
11 Agreement, do you?

12 MR. D'AMICO: No, because it's addressed
13 in the access tariff.

14 MR. KEFFER: If that situation came pass,
15 your access revenues would go down, would they not?

16 MR. D'AMICO: If we were to take it out of
17 the access tariff and the access tariff doesn't
18 apply to something else?

19 MR. KEFFER: No. If in my hypothetical
20 the Interconnection Agreement contemplated an
21 arrangement where a call was routed, your end
22 office through AT&T switch as a tandem and on to an

1 interexchange carrier, in that circumstance AT&T
2 would get access revenues at the tandem, you would
3 not get access revenues in that circumstance;
4 right?

5 MR. D'AMICO: Well, that's like saying if
6 we put in the contract that access is free, would
7 our access revenues go down, the answer would be
8 yes.

9 MR. KEFFER: I'm just trying to understand
10 your objection to the arrangement I described in my
11 second hypothetical.

12 The objection is that, from your
13 perspective, it's in the access tariff, not in the
14 Interconnection Agreement.

15 MR. D'AMICO: Right. And basically what's
16 happening is that AT&T is providing a service to
17 interexchange carriers, and that again is addressed
18 in the access tariff, FCC number one. So, A, it's
19 already covered, and B, it's not appropriate that
20 it should be in an Interconnection Agreement.
21 That's our basic position on that.

22 MR. KEFFER: Okay. Those are all my

1 questions.

2 MR. STANLEY: Okay. So, I guess Verizon
3 is up next.

4 MR. EDWARDS: We have no questions for
5 this panel.

6 MR. STANLEY: Could we take a
7 couple-minute break.

8 (Brief recess.)

9 MR. DYGERT: We are back on the record.
10 Gentleman, first, good afternoon, and second could
11 you please identify yourselves for the record.

12 MR. GREEN: I'm William Green. I'm the
13 wholesale E911 national product manager for
14 Verizon.

15 MR. SIGUA: Willie Sigua of WorldCom,
16 S-I-G-U-A.

17 Whereupon,

18 WILLIE SIGUA

19 WILLIAM GREEN

20 were called for examination by the Commission and,
21 after having been duly sworn by the notary public,
22 were examined and testified as follows:

1 QUESTIONS FROM STAFF

2 MR. KEHOE: I'm William Kehoe for the FCC,
3 and I'm going to ask a few questions about issues
4 IV-7 and IV-9 that deal with 911 and E-911.

5 I would like to begin with the Verizon
6 witness.

7 Am I correct--

8 MR. STANLEY: First of all, for the
9 record, both parties have agreed to waive cross,
10 Verizon and WorldCom agreed to waive cross?

11 MR. OATES: Yes, that's correct.

12 MR. MONROE: Yes, correct.

13 MR. KEHOE: Am I correct that the main
14 substantive issue between the party concerns the
15 alternative routing codes to get 911 traffic to
16 public service answering points?

17 MR. GREEN: Yes, that is the primary
18 issue.

19 MR. SIGUA: I would say one of the
20 primary.

21 MR. KEHOE: Which other issues are there,
22 very briefly?

1 MR. SIGUA: If routing is the crux of
2 giving what we need for the public safety, I was
3 going to Verizon for connection to their tops
4 operator service at the platform.

5 MR. KEHOE: Thank you. Does WorldCom
6 presently have the alternative routing codes for
7 the State of Virginia?

8 MR. SIGUA: When you say "alternative
9 routing," there is no--the only alternative routing
10 that we have, so to speak, is the built-in
11 redundancy on our trunking. If those trunking
12 fails, we have no other alternative routing like
13 Verizon, so the safety parity does not exist on our
14 network.

15 MR. KEHOE: Let me rephrase my question.
16 Their codes, as I understand it, route--are used to
17 route traffic to a public service answering point
18 when Verizon's 911 tandem cannot handle the
19 traffic.

20 Do you know whether WorldCom presently has
21 those numbers?

22 MR. SIGUA: At this time we do not. What

1 we do have is when we have negotiated with the
2 local entities, they have elected not to use
3 ten-digit--back what we call ten-digit back door
4 number. We explained to them we still need an
5 avenue for this means due to answer minus engineer
6 phone calls. Usually an operator would say please
7 dial 911 for emergency. If that person says I have
8 dialed 911 and I'm getting busy, please connect me
9 to 911. So, operator platform was given ten-digit
10 numbers, all right, that they can call the local
11 PSAP. That's for the operator platform.

12 But for our network, we have none. We
13 will scramble, all right? Whether we do get an
14 indication that we went critical both our second
15 and primary routers down, we will verify the
16 ten-digit number that we have given to the operator
17 even if they try to make contact with the PSAP or
18 even with Verizon, if those ten-digit numbers that
19 we have identified is still viable, and therefore
20 we could overflow for those numbers.

21 MR. KEHOE: I would like to ask Verizon,
22 do you know how many public service answering point

1 coordinators there are in the State of Virginia?

2 MR. GREEN: No, I don't.

3 MR. KEHOE: Do you have an approximate
4 number?

5 MR. GREEN: I guess about 20.

6 MR. KEHOE: Can you describe the process
7 you go through to obtain the alternative routing
8 numbers from the public service answering point
9 coordinators.

10 MR. GREEN: Sure. Let me just begin by
11 saying in the State of Virginia we don't use
12 ten-digit routing numbers as a tertiary means of
13 getting through to the PSAP. What we have in the
14 State of Virginia is dual tandems and trunks going
15 out to each one of the tandems. We have primary
16 and secondary tandem. If both trunks at a minimum
17 to the trunks go to tandem A and for some reason we
18 can't get the calls through, it will then route
19 over to tandem B. If tandem B fails for some
20 reason, which is very, very unusual, the calls are
21 then routed over through our Verizon tops switch
22 which is our operator service switch. And it's

1 routed back through the tandems.

2 If at that point the call still fails, the
3 customer gets a recording it does not route to a
4 ten-digit number in Virginia.

5 MR. KEHOE: Have you agreed to make the
6 same sort of routing to WorldCom?

7 MR. GREEN: We do provide them access to
8 the two tandems we have in each one of the areas in
9 which we operate in Virginia. We do not allow
10 access to our top switch unless they subscribe to
11 our operator services product.

12 MR. KEHOE: Could you explain the
13 operation of the top switch again.

14 MR. GREEN: It's the tertiary means of the
15 routing the call in case the other two tandems
16 fail. It's a passthrough. It's called "tops
17 passthrough." That brings the call over to the
18 router back to the tandems.

19 MR. KEHOE: Does WorldCom have a
20 capability equivalent to that in Virginia?

21 MR. SIGUA: My background, I have as
22 switch manager for New York Telephone. I have